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PRMT-SECTION

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

April 21, 1995

CERTIFIED MAIL P 179 977 923  
RETURN RECEIPT REQUESTED

Mr. Joe Haake  
McDonnell-Douglas, St. Louis  
Environmental and Hazardous  
Materials Services  
P.O. Box 516, Department 64C  
Mail Code 1003377  
St. Louis, MO 63166-0516

RE: Comment letter on the February 1994, Part B RCRA  
Application for Hazardous Waste Management Facility  
McDonnell Douglas Corporation-St. Louis, Tract I  
EPA ID Number: MOD000818963

Dear Mr. Haake:

The Missouri Department of Natural Resources (MDNR) has completed a review of the Part B permit application for the Tract I facility. The following comments are for your review and shall be used to prepare a revised application. Four (4) copies of this application shall be submitted within thirty (30) days of receipt of this letter.

COMMENTS

1. In Section 14.0, which is the application form, McDonnell-Douglas shall provide the printed name and title of the person signing as "Operator". McDonnell-Douglas shall move the application form to the front of the permit application, placing it after Section 1.0.



R00148145  
RCRA RECORDS CENTER

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2. To comply with 40 CFR 270.3(b) McDonnell-Douglas needs to fill out the enclosed Questionnaire to Determine Need for Cultural Assessment. Likewise, to comply with 270.3(c) the facility must contact:

The United States Fish and Wildlife Service  
608 East Cherry Street  
Columbia, MO 65201

The Missouri Department of Conservation  
P.O. Box 180  
Jefferson City, MO 65102

If McDonnell-Douglas does not receive a response in time to include in the revised permit application, the letters that were sent to the above agencies shall be included.

3. The facility receives waste from other local McDonnell-Douglas facilities, including St. Charles. The procedure for receiving wastes from off-site sources shall be described, and all shipments from off-site sources shall undergo a fingerprint analysis before being included in the container storage area.
4. All waste streams being shipped off-site to a treatment or disposal facility must be accompanied by a land disposal restriction form, as per 40 CFR 268.7 (a), whether or not the stream is restricted. The revised permit application shall include a copy of this form in Section 3.0.
5. Several items that are only inspected weekly shall be added to the daily inspection list. These are: "proper aisle space", "incompatible waste separated", and "spill control equipment present". Inspection for cracks in the pad should be added to the weekly inspection schedule. If found, cracks shall be fixed immediately.
6. According to Section 6.0 the Fire Services Department has at least six (6) firemen and one (1) officer on duty at any given time. According to the "Spill Prevention and Response Plan" (SPR), page 30, there are four (4) firemen on weekdays and three (3) firemen on weekends. Which number is correct? Please clarify.
7. Copies of the contingency plan shall be kept at the applicable police, hospital, and emergency response facilities as per 40 CFR 264.53 (b).

8. Section 9.5 shall include the job titles and duties of every position related to hazardous waste management. Specific names are not required.
9. Under Section 8.0, McDonnell-Douglas must provide a list of the contents of the manifest and the operating record. It is not enough for the facility to state that it will comply with the regulations, it must also demonstrate how it complies with the regulations.
10. The facility must list the exact qualifications of the staff that conduct the hazardous materials personnel training.
11. McDonnell-Douglas does have to comply with the seismic standard in accordance with 10 CSR 25-7.270(2)(B)4. This requires certification that the facility can withstand stresses due to earthquake loading. Certification must come from a qualified independent professional engineer registered in Missouri.
12. The MDNR does not feel that the submitted closure plan is adequate. Following are a list of comments addressing the closure plan. McDonnell-Douglas shall incorporate these comments into a revised closure plan to be submitted with the updated permit application.
  - a. In the event that "clean" closure is not possible, McDonnell-Douglas shall submit a permit modification request and a revised closure plan for MDNR's approval. The facility shall incorporate this statement in the revised permit application.
  - b. In addition to the asphalt sampling, McDonnell-Douglas shall also sample the concrete underneath the asphalt and in the sump area, and the shallow soil beneath the concrete. The sampling in Area 1 will be done on a five hundred (500) square foot basis, which would amount to seven (7) boreholes in Area 1. Area 2 shall have two (2) boreholes. Each borehole shall be sampled in three (3) intervals: once each in the asphalt, concrete, and soil. These samples shall focus on stained or cracked areas.
  - c. All samples taken shall be tested for the hazardous wastes/hazardous waste constituents listed in the final permit.
  - d. McDonnell-Douglas shall submit with the revised permit application all the Practical Quantitation Limits (PQLs) for the listed wastes. The closure will be considered "clean"

when the material in the samples is below the PQLs, except in the case of metals-contamination. For concrete, the level of metals must be less than the TCLP toxicity limits which are listed in 40 CFR 261.24 Table 1 and equal to or less than the total concentration of metals in concrete, as listed in the Portland Cement Association's publication An Analysis of Selected Trace Metals in Cement and Kiln Dust. For soils, the level of metals must be equal to or less than the background samples. A minimum of three (3) background samples are necessary, fifty (50) feet away from any contaminated/effected area and fifty (50) feet away from each other.

- e. Sections 10.4 and 10.7 mention decontamination of equipment and structures. McDonnell-Douglas shall describe these decontamination procedures, which shall include, at a minimum, a wash with a non-phosphate detergent, a second rinse with distilled/deionized water, an appropriate solvent rinse, and a final rinse with distilled/deionized water.
  - f. If McDonnell-Douglas intends to demolish the metal structures, no analysis is necessary. All the facility needs to do is triple rinse the structures, cut them up on-site, and obtain a Certificate of Destruction from the smelter.
  - g. MDNR's Hazardous Waste Program and Water Pollution Control Program shall be notified forty-five (45) days prior to conducting closure activities. MDNR's Hazardous Waste Program and St. Louis Regional Office shall be notified fifteen (15) days prior to sampling activities.
  - h. The closure cost estimate is not detailed enough to determine whether or not it is reasonable. McDonnell-Douglas shall submit a new closure cost estimate listing a breakdown of the cost of each closure action and expense. This new estimate must include all of the changes required above and the costs must be third-party costs. Within sixty (60) days of revising the closure cost estimate, McDonnell-Douglas shall update their financial assurance.
13. Container Storage Area 1 is divided into two (2) sections to segregate incompatible wastes. In compliance with 264.17 (c), McDonnell-Douglas must document that no incompatible wastes are being stored together in either section of Area 1, or, if such wastes are being stored together, that the situation poses no threat to human health or the environment.

14. The facility must have a definite staging area in front of Area 1 for placement of containers requiring emergency care, or for temporary placement of containers prior to being moved into the container storage area. This temporary storage area must contain the required ten (10) percent of the total container volume, just as was required for the main container storage areas.
15. After inspecting the facility, it appears that the loading area directly in front of Area 1 is very congested. McDonnell-Douglas shall clear this area of debris, including the recyclable, salvageable, and solid waste material that is present in the loading area.
16. The diagram of Area 2 is not adequate. It must include a title space designating it as Area 2 and a floor plan which includes the size and location of the sump.
17. Section 7.9 mentions the coated metal collection sump. What is the nature of this coating? Will it protect against possible corrosives that might get into the sump? McDonnell-Douglas shall address these concerns.
18. Section 13.7.1 mentions an industrial sewer line. What is the industrial sewer line? McDonnell-Douglas shall submit their criteria for discharging fluids to this sewer, as well as approval for doing so from the local sewer district and/or the MDNR Water Pollution Control Program.
19. If the list of elected officials has changed, McDonnell-Douglas shall submit a new list with the revised permit application.
20. In accordance with 10 CSR 25.7.270(2)(H), habitual violator disclosure, McDonnell-Douglas needs to submit information on any person, corporation, and business owned by the applicant, or owning an interest in the applicant; and any information on officers and management employees of McDonnell-Douglas, its subsidiaries and owners. Enclosed is a disclosure statement that should aid McDonnell-Douglas in determining what information needs to be submitted. No disclosures are needed for any violations already reported, or for any violations alleged since February 25, 1994. If the facility has any questions regarding habitual violator information, they can contact Mr. Edward Galbraith, Chief of the Hazardous Waste Permits Support Unit, at (314) 751-3176.

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If you have any question concerning these comments, please contact me at  
(314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Brian McCurren  
Environmental Engineer  
Permits Section

BM:js

Enclosures

c: ~~Bob~~ Stewart, P.E., U.S. EPA Region VII  
St. Louis Regional Office